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1 Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned 2 counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs 3 and Defendants to finalize search term negotiations and submit a status report from September 19, 4 2024 to September 25, 2024. See Discovery Management Order No. 10 (ECF 1157) (setting 5 September 19, 2024 deadline). 6 The Parties declare in support of this request: 7 1. Plaintiffs and Defendants are engaged in ongoing search term negotiations relating 8 to Defendants' Requests for Production. 2. 9 Plaintiffs and Defendants are also engaged in discussions related to Plaintiffs' obligations under the Family Educational Rights and Privacy Act ("FERPA"). 10 3. 11 Plaintiffs and Defendants mutually agree that they would benefit from more time to continue their conferrals regarding FERPA and attempt to narrow disputes regarding search 12 13 terms. 4. Plaintiffs and Defendants believe that an extension until September 25 to finalize 14 15 negotiations will afford adequate time for such negotiations. 5. Extending this deadline will not affect any other deadline affixed by the Court. 16 17 6. This is the first request to extend this deadline. 18 THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and 19 respectfully request that the Court extend the deadline for Plaintiffs and Defendants to finalize 20 search term negotiations and submission of the status report regarding same to September 25, 2.1 2024. IT IS SO ORDERED. 22 23 DATED: PETER H. KANG 24 UNITED STATES MAGISTRATE JUDGE 25 26 27 28

1	IT IS SO STIPULATED AND	D AGREED.
2	DATED: September 19, 2024	Respectfully submitted,
3		<u>/s/Lexi J. Hazam</u> LEXI J. HAZAM
4		LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
5 6		275 BATTERY STREET, 29TH FLOOR SAN FRANCISCO, CA 94111-3339
7		Telephone: 415-956-1000 lhazam@lchb.com
8		PREVIN WARREN MOTLEY RICE LLC
9		401 9th Street NW Suite 630 Washington DC 20004
10		Telephone: 202-386-9610 pwarren@motleyrice.com
11		Co-Lead Counsel
12		CHRISTOPHER A. SEEGER
13		SEEGER WEISS, LLP 55 CHALLENGER ROAD, 6TH FLOOR
14		RIDGEFIELD PARK, NJ 07660 Telephone: 973-639-9100
15		cseeger@seegerweiss.com
16		Counsel to Co-Lead Counsel
17		JENNIE LEE ANDERSON ANDRUS ANDERSON, LLP
18		155 MONTGOMERY STREET, SUITE 900 SAN FRANCISCO, CA 94104
19		Telephone: 415-986-1400 jennie@andrusanderson.com
20		Liaison Counsel
21		EMILY C. JEFFCOTT MORGAN & MORGAN
22		633 WEST FIFTH STREET, SUITE 2652 LOS ANGELES, CA 90071
23		Telephone: 213-787-8590 ejeffcott@forthepeople.com
24		ejeneou @ normepeople.com
25		
26		
27		
28		

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1		BEASLE	VANZANDT Y ALLEN			
2	234 COMMERCE STREET MONTGOMERY, LA 36103					
3	Telephone: 334-269-2343 joseph.vanzandt@beasleyallen.com					
4		Federal/S	tate Liaisons			
5		MATTHI	EW BERGMAN			
6		GLENN 1		S LAW CENTER		
7		821 SEC	OND AVENUE, SU E, WA 98104			
8		Telephon	e: 206-741-4862 cialmediavictims.or	α		
9			ocialmediavictims.o			
10			. BILSBORROW	DC.		
11		700 BRO		rc		
12		Telephon	ORK, NY 10003 e: 212-558-5500			
13		J	w@weitzlux.com			
14			NS HANLY CONF			
15		NEW YC	DISON AVE, 7TH I DRK, NY 10016	FLOOR		
16			e: 917-882-5522 simmonsfirm.com			
17		ANDRE :				
18		1111 BR0	A <b>W GROUP, LL</b> I DADWAY, SUITE			
19			ND, CA 94607 e: 510-350-9717			
20		amm@cla	asslawgroup.com			
21		WALSH				
22		Washingt	necticut Ave, NW, on D.C. 20036	Suite 500		
23		Telephon	e: 202-780-3014 alexwalshlaw.com			
24						
25						
26						
27						
28						
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1 2		LEVIN S	L M. WEINKOWI EDRAN & BERM			
3		510 WALNUT STREET SUITE 500 PHILADELPHIA, PA 19106				
4		Telephon	e: 215-592-1500 witz@lfsbalw.com	,		
5		Plaintiffs <sup>3</sup>	Steering Committee	ee Leadership		
6		RON AU				
7		400 MAN	STIN LAW HATTAN BLVD.			
8		Telephon	7, LA 70058 e: 504-227–8100 conaustinlaw.com			
9		PAIGE B				
10		WALSH		Suite 100		
11		San Anto	nio, TX 78257 e: 210-448-0500			
12			alexwalshlaw.com			
13		WAGST	S P. CARTMELL <b>AFF &amp; CARTME</b> I			
14		Kansas C	nd Avenue, Suite 30 ity, MO 64112	00		
15			e: 816-701-1100 @wcllp.com			
16		SARAHI		NAME OF THE PARTY BOX		
17		600 WES	T MAIN STREET,	SHN EMERY PSC SUITE 100		
18 19		Telephone	ILLE, KY 40202 e: 859-600-6725			
20		,	justicestartshere.coi GOLDBERG	.11		
21			LDBERG, PLLC			
22			, NY 11241 e: 646-666-8908			
23		carrie@ca	ngoldberglaw.com			
24		HENDY		SHN EMERY PSC		
25		LOUISVI	T MAIN STREET, ILLE, KY 40202	SUITE 100		
26			e: 859-578-4444 @justicestartshere.c	om		
27						
28						

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1		AYLSTO	G MARY LIU OCK WITKIN KR	EIS &			
2		OVERHOLTZ, PLLC 17 EAST MAIN STREET, SUITE 200					
3	PENSACOLA, FL 32502 Telephone: 510-698-9566						
4			kolaw.com				
5		JAMES N MARSH	MARSH <b>LAW FIRM PLL</b>	C			
6		31 HUDS	SON YARDS, 11TH ORK, NY 10001-217	I FLOOR			
7		Telephon	e: 212-372-3030 rsh@marshlaw.com				
8		· ·	E. MELTER				
9		KESSLE		ZER & CHECK LLP			
10		RADNOI	R, PA 19087 e: 610-667-7706	<i>AD</i>			
11			ktmc.com				
12		HILLAR					
13	HACH & ROSE LLP 112 Madison Avenue, 10th Floor New York, New York 10016						
14		Telephon	e: 212-213-8311				
15			hrsclaw.com				
16			PAPANTONIO RA				
17		PENSAC	TH BAYLEN STR OLA, FL 32502	EE1, SUITE 000			
18			e: 850-435-7107 Plevinlaw.com				
19			HI RIZKALLA	NA DC			
20		1500 ROS	RLSON LAW FIR SECRANS AVE., S	STÉ. 500			
21		Telephon	TTAN BEACH, CA e: 415-308-1915				
22			© carlsonattorneys.c	om			
23		DAVID F	TELLIS FERNANDES				
24		15910 Ve	& BUDD, P.C. entura Boulevard, Su	uite 1600			
25			e: 818-839-2333				
26			aronbudd.com es@baronbudd.com				
27							
28							
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1		MELICS	A YEATES			
1		KESSLE	R TOPAZ MELT	ZER & CHECK LLP		
2	280 KING OF PRUSSIA ROAD RADNOR, PA 19087					
3			e: 610-667-7706 ktmc.com			
4				SE ZIMMERMANN		
5		505 20th				
6			am, Alabama 35203	3		
7		Telephon fu@dicell	e: 205-855-5700 lolevitt.com			
8		Plaintiffs'	Steering Committee	ee Membership		
9		Attorneys	for Individual Plai	ntiffs		
10						
11						
12	COVINGTON & BURLING LLP					
13	Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067					
14						
15						
16		Telephon	e: (424) 332-4800 :: + 1 (424) 332-474	LQ		
17			imonsen@cov.com			
18			. Jones, <i>pro hac vice</i> Schmidt, <i>pro hac vic</i>			
19			TON & BURLING			
20		850 Tenth	n Street, NW on, DC 20001-4956	5		
21		Telephon	e: +1 (202) 662-60 e: +1 (202) 662-629	00		
22		Email: pa	jones@cov.com	, I		
23		•	chmidt@cov.com	a Diatforms Inc		
24		f/k/a Face	for Defendants Met ebook, Inc.; Facebo	ok Holdings,		
25		Payments	rebook Operations, , Inc.; Facebook Te	echnologies, LLC;		
26		Instagran Zuckerbei	ı, LLC; Siculus, Inc rg	.; ana wark Elliot		
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1			Chler (SBN 29652)				
2		Victoria A. Degtyareva (SBN 284199) Laura M. Lopez, (SBN 313450)					
3		MUNGE	Seshuva (SBN 3242 R, TOLLES & OLS	ON LLP			
4		Los Ange	n Grand Avenue, 50 des, CA 90071-3420				
5		Facsimile	e: (213) 683-9100 : (213) 687-3702				
6		Email: vio	se.ehler@mto.com ctoria.degtyareva@				
7			riel.Teshuva@mto.c				
8		MUNGE	. Bell ( <i>pro hac vice</i> , R, TOLLES & OLS	ON LLP			
9		Suite 500		·			
10		Washington, D.C. 20001-5369 Telephone: (202) 220-1100					
11	Facsimile: (202) 220-2300 Email: lauren.bell@mto.com						
12	Attorneys for Defendant Snap Inc.						
13	John H. Beisner (State Bar No. 81571)						
14	Nina R. Rose ( <i>pro hac vice</i> ) SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP						
15	MEAGHER & FLOM LLP  1440 New York Avenue, N.W., Washington, DC 20005 Telephone: (202) 371-7000 Email: John.Beisner@skadden.com Email: nina.rose@skadden.com  Jessica Davidson (pro hac vice) SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP One Manhattan West						
16							
17							
18							
19							
20	New York, NY 10001 Telephone: (212) 735-2588						
21	Email: Jessica.Davidson@skadden.com						
22			vid Russell (SBN 16 EN, ARPS, SLATE,				
23	SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 300 South Grand Avenue						
24	Suite 3400 Los Angeles, CA 90071-3144						
25		Telephon	e: (213) 687-5328 son.russell@skadde				
26			rnescu ( <i>pro hac vice</i>				
27	SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP						
28		320 S. Ca					

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1		Ste 47th F				
2	Chicago, IL 60606-5707 Telephone: (312) 407-0700					
3			ra.bernescu@skad			
4		SKADDE	Mullaley ( <i>pro hac</i> N, ARPS, SLATE	vice)		
5		500 Boyls				
6			e: (617) 573-4851			
7			herine.mullaley@s			
8			SONSINI GOODI al Corporation	RICH & ROSATI		
9		/s/ Brian M	M. Willen			
10			Willen ( <i>pro hac vid</i> SONSINI GOODI			
11		1301 Ave	nue of the America	as, 40th Floor		
12		New York, New York 10019 Telephone: (212) 999-5800 Facsimile: (212) 999-5899				
13			rillen@wsgr.com			
14			allo White (SBN 30			
15	Samantha A. Machock (SBN 298852) WILSON SONSINI GOODRICH & ROSATI One Market Plaza, Spear Tower, Suite 3300					
16		San Franc	isco, CA 94105 e: (415) 947-2000	wei, buile 3300		
17		Facsimile:	(415) 947-2099			
18	Email: lwhite@wsgr.com Email: smachock@wsgr.com					
19			er Chiou (SBN 233 K. Donohue (SBN			
20		WILSON	SONSINI GOODI	RICH & ROSATI		
21		Los Angel	les, CA 90013 e: (323) 210-2900			
22		Facsimile:	(866) 974-7329 niou@wsgr.com			
23			lonohue@wsgr.com	n		
24		Attorneys LLC	for Defendants Yo	иTube, LLC and Google		
25		220				
26						
27						
28						

STIP AND [PROP] ORDER REQUESTING ADDITIONAL TIME FOR SD BELLWETHER SEARCH TERMS CASE NO. 4:22-MD-03047-YGR (PHK)